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**BY CM/ECF**

The Honorable Evelyn Padin, U.S.D.J.  
United States District Court for the District of New Jersey  
Frank R. Lautenberg P.O. Building and U.S. Courthouse  
One Federal Square  
Newark, NJ 07102

**Re: *Metacel Pharmaceuticals, LLC v. Rubicon Research Private Limited*  
Civil Action No. 21-19463-EP-JRA**

Dear Judge Padin:

We, along with our co-counsel, Arnall Golden Gregory LLP, represent Plaintiff Metacel Pharmaceuticals LLC ("Metacel") in the above matter. We write on behalf of all parties in the above matter, pursuant to L. Pat. R. 4.6 and the Court's April 1, 2022 Pretrial Scheduling Order (ECF No. 25), to request that the Court schedule a *Markman* Hearing in this matter.

Subject to the Court's convenience, the parties have conferred and are available for a *Markman* Hearing on January 18-20 and the week of January 23, subject to the Court's availability in that time period. If these dates are not convenient to the Court, the parties are happy to provide additional dates.

The parties respectfully propose that the *Markman* Hearing last no more than three (3) hours, split equally between the two sides. The parties also submit that live witnesses at the hearing are unnecessary.<sup>1</sup>

We thank the Court for its consideration in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Arnold B. Calmann", written over a horizontal line.

Arnold B. Calmann

cc: Counsel of record (by CM/ECF)

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<sup>1</sup> While there is an existing dispute between the parties regarding the use of plaintiff's expert for purposes of claim construction, defendant has deposed the expert and plaintiff is willing to rely upon his deposition testimony as opposed to having him appear live at the hearing.